

Richard Karney  
Energy Star Windows  
U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, DC 20585

Dear Rich:

Thanks for the opportunity to participate in the DOE meeting on Energy Star Windows. I commented last fall during the review process and felt that I had communicated my position so did not send an additional letter after the DOE retraction letter even though I had written it. After returning home from the meeting I have decided to send it anyway with a couple of additional comments. I am doing this as it seems that we have a somewhat silent majority that may be unfairly impacted because of a very verbal minority.

Marvin Windows and Doors still support the current DOE proposal. In spite of the various predicted savings, based on computer program/market models we believe that it will deliver the most actual savings. I say actual because the computer market models do not compensate for actual products that are now being or will be delivered to the market if the change is made to proposal # 5.

The Energy Star program has been very successful due to participation by many manufacturers like Marvin. Making changes to satisfy a small verbal minority that have had little to do with these successes seems unwise. Future progress and market penetration with energy saving windows and doors rests with your existing partners. Do not disenfranchise those that have supported you or you may end up with a verbal majority.

Marvin Windows and Doors again extend the offer to provide DOE with Certified ratings that clarify the performance of actual products being installed in homes in these areas. If changes are inevitable they should be based on facts and not computer models. Extending the 0.35 U-factor requirement at the expense of the 0.40 SHGC does not seem to be a justifiable trade off. The fact is it will reduce the products available. Many products that comply with the 0.40 SHGC have U-factors in the 0.37 to 0.38 U-factor range and will be restricted to the <3499 heating degree days. It is also true that only a limited number of high SHGC products can comply with the 0.35 U-factor so most will not comply in any zones. I can not understand the justification for proposal # 5.

Thanks again for this opportunity communicate the Marvin Windows and Doors position.

Sincerely,

James C. Krahn